

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

IN RE:) Chapter 11 Proceeding
)
COMMERCIAL MORTGAGE & FINANCE CO.) Case No. 08-73242
)
Debtor and Debtor in Possession.) Hon. Manuel Barbosa

**NOTICE OF MOTION AND HEARING ON PROFESSIONALS'
FINAL APPLICATION FOR ALLOWANCE AND PAYMENT OF COMPENSATION**

TO: Attached Service List

PLEASE TAKE NOTICE that on October 8, 2008, Commercial Mortgage & Finance Co. (the "Debtor") filed for Chapter 11 Bankruptcy relief under Title 11 of the Bankruptcy Code. On December 22, 2008, an Order was entered Authorizing Employment and Retention of Oliver, Close, Worden, Winkler & Greenwald LLC, as Special Litigation Counsel for the Debtor.

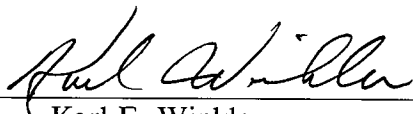
PLEASE TAKE FURTHER NOTICE that on September 15, 2009, Oliver, Close, Worden, Winkler & Greenwald LLC filed its Final Application for Payment of Compensation requesting unpaid compensation sought as actual, reasonable, and necessary in the amount of \$12,041.00 for the period of December 22, 2008 through August 19, 2009.

PLEASE TAKE FURTHER NOTICE that the hearing on the Application is scheduled for September 30, 2009, at 10:30 a.m. in Courtroom 115, 211 South Court Street, Rockford, Illinois, before the Honorable Manuel Barbosa, or any Judge sitting in his stead.

Dated this 15th day of September, 2009.

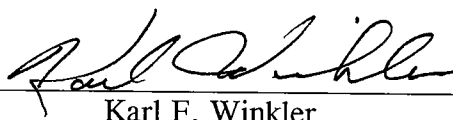
Respectfully Submitted,

OLIVER, CLOSE, WORDEN, WINKLER &
GREENWALD LLC

BY: 
Karl F. Winkler

CERTIFICATE OF SERVICE

I, Karl F. Winkler, certify that on September 15, 2009, I served this Notice of Motion and the document referred to herein to all persons who have followed the electronic notice procedures in the above-referenced case, on the persons listed on the Service List, via U.S. Mail, and by electronically filing the same with the United States Bankruptcy Court.



Karl F. Winkler

PREPARED BY:

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Dorothy E. Klingbeil
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Rockford, IL 61108

Earl L. Hodgkinson
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Belvidere, IL 61088

Glen L. Rippentrop
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Monroe Center, IL 61062

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10245 Tybow Trail
Roscoe, IL 61073

James L. Kramer
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Lombard, IL 61048

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Winnebago, IL 61088

Jerome J. Strohacker
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Freeport, IL 61032

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Rockford, IL 61108

Maria T. Liebling
975 South Bell School road
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Nancy Pohl
c/o Becky Voll
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Machesney Park, IL 61115

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Salvador Sciortino
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Rockford, IL 61109

Samuel R. Rebecca
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Rockford, IL 61107

Shirley Sellers, Trustee
1304 Riverbend Lane
Belvidere, IL 61008

Wayne Holton
6366 Fitzgerald Road
Rockford, IL 61103

Bradley T. Koch, Esq.
HOLMSTROM & KENNEDY, P.C.
800 North Church Street
Post Office Box 589
Rockford, IL 61105

Ms. Carole Ryczek
Office of the U.S. Trustee
780 Regent Street, Suite 304
Madison, WI 53715

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

IN RE:) Chapter 11 Proceeding
)
COMMERCIAL MORTGAGE & FINANCE CO.) Case No. 08-73242
)
Debtor and Debtor in Possession.) Hon. Manuel Barbosa

**FINAL APPLICATION OF OLIVER, CLOSE, WORDEN, WINKLER
& GREENWALD LLC FOR PAYMENT OF COMPENSATION**

Counsel for the Debtor, Karl F. Winkler, Debra A. Delia, and Timothy A. Miller, and the firm's paraprofessionals of Oliver, Close, Worden, Winkler & Greenwald LLC (the "Firm"), files the Firm's Final Application for Compensation and Payment of Expenses pursuant to §327(e) 330, Bankruptcy Rule 2016, the Order Confirming the Plan, and the other applicable provisions and rules for allowance of payment of (i) compensation in the amount of \$12,041.00 for reasonable and necessary unpaid legal services that the Firm has rendered for the period between December 22, 2008 and August 19, 2009, to the Debtor, (ii) the reimbursement of the actual and necessary expenses that the Firm has incurred in the amount of \$-0- between December 22, 2008 and August 19, 2009; and (iii) immediate payment of allowed fees and expenses from the Debtor's accounts.

In support of the Final Application, Karl F. Winkler states as follows:

BACKGROUND

1. History. The Firm has acted as outside counsel for Commercial Mortgage & Finance Co. for the last several years. In that capacity, at the time of the bankruptcy filing,

certain foreclosure matters, claims by the debtor against other parties, and legal matters between Commercial Mortgage & Finance Co. and other parties were ongoing.

2. Fees and costs. The pre-bankruptcy filing fees incurred by the debtor in these matters were \$3,175.50 for which a claim has been filed in the Estate. Applicant has previously applied for, been allowed and paid \$ 32,357.54 in fees.

3. Retention as Special Counsel Petition. By a Petition filed November 5, 2008, the debtor petitioned to have the Firm appointed as special counsel for the purpose of “representation of the debtor in litigation matters occurring in the ordinary course of its business including prosecution and completion of mortgage foreclosures, defending claims by debtors or mechanic’s liens claimants, drafting loan documents and pleadings, advising and assisting on insurance and title insurance coverage in claims matters, and other litigation matters unrelated to this bankruptcy case, as well as acting as local counsel for bankruptcy counsel”.

4. Order Appointing. On December 22, 2008, this Court appointed the Firm as Special Litigation Counsel upon the terms set forth in the Application. In that Order the Court ordered that Special Litigation Counsel would be entitled to receive reasonable compensation for the services and to receive reimbursement of actual, necessary expenses under the provisions of the bankruptcy code and rules.

5. Post Petition matters generally.

The Firm represents the Debtor in a number of matters, including, but not limited to, mortgage foreclosures, defense of mechanic’s lien claims, suits on personal guarantees of debtors, rent, eviction, and other collection proceedings in Illinois and Wisconsin. Some of

the matters have been resolved and some are ongoing. The open matters are shown in the Summary Table attached as Exhibit "A" and detail of the billable time spent is shown by the attachments for each matter through August 19, 2009, as Group Exhibit "B". Expenses incurred and reimbursed are shown in the Trust Account detailed entry as Exhibit "C".

NOTICE

7. Pursuant to Bankruptcy Rule 2002(a)(6), the Firm has provided the twenty-day notice to parties in interest by mail to (a) the United States Trustee; (b) the Debtor's twenty (20) largest unsecured creditors; and (c) the Creditor's Committee. In light of the nature of the relief requested, the Firm submits that no further notice is required.

RATES PER FIRM ATTORNEY

Karl F. Winkler	\$250.00 per hour
Debra A. Delia	\$230.00 per hour
Timothy A. Miller	\$210.00 per hour
John Rearden	\$215.00 per hour

WHEREFORE, the Firm respectfully requests that the Court enter an order:

A. Allow and pay the Firm \$12,041.00 as unpaid professional fees incurred between December 22, 2008 and August 19, 2009 to be paid from general funds of the Debtor, and approves payment of the costs and expenses of \$1,181.75 from the costs advance retainer trust account;

B. Entry of an Order authorizing and directing payment of the allowed fees and costs by the Debtor in the form attached hereto; and

C. Granting such other and further relief as the Court sees fit.

OLIVER, CLOSE, WORDEN, WINKLER &
GREENWALD LLC

BY: 
Karl F. Winkler

PREPARED BY:

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SUMMARY LIST OF PRINCIPAL ACTIVITIES

Matter	Description	Costs	Fees	Total
General	General Corporate Advice	\$0.00	\$563.00	\$563.00
Aire Holding	Prepare for trial & negotiate settlement	\$0.00	\$200.00	\$200.00
Affiliated Financial Corporation	Collection from Steve Smith	\$0.00	\$23.00	\$23.00
Barnhart	Defend foreclosure & establish amount and priority	\$0.00	\$189.00	\$189.00
Neftali	Two foreclosures and two suits on guarantees; defend motion to vacate	\$95.00	\$1,575.00	\$1,670.00
Mid-Deb	Sale of real estate	\$0.00	\$1,000.00	\$1,000.00
Valentine	Sheriff's deed; conference with debtor Smith and his attorney; advice re: Art 9 sale			
Heling	Wisconsin foreclosure; establish priority and amount	\$8.37	\$84.00	\$92.37
CMF Insurance	Investigate and gather materials re: fraud of agency; declare default; gather materials to value book of business (3 different lawyers for CMF Ins.)	\$77.00	\$3,552.00	\$3,629.00
Bankruptcy Matter	Advice and conferences	\$262.88	\$1,325.00	\$1,587.88
Winchester Bldrs	Foreclosure complaint; enter appearance by defendant; serve lienors; get judgment	\$14.85	\$1,050.00	\$1,064.85
A&D Properties	Foreclosure complaint and amendment; enter appearance by defendant; serve additional lien claimants	\$324.15	\$375.00	\$699.15
Clark, Randall	Two notes and two lawsuits on notes	\$0.00	\$175.00	\$175.00
Thorhen Capital	Lease Advice	\$0.00	\$125.00	\$125.00
Guerra Lease	Proceedings and tenant	\$0.00	\$125.00	\$125.00
Steven Moore	Eviction and collection	\$399.50	\$1,680.00	\$2,046.00
TOTAL		\$1,181.75	\$12,041.00	\$13,222.75

Exhibit "A"

Oliver, Close Worden, Winkler &
 reenwald's Final Application for Allowance
 of Payment of Compensation

**OLIVER, CLOSE, WORDEN,
WINKLER & GREENWALD LLC**

Attorneys at Law
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Rockford, IL 61110-4749
Telephone: (815) 968-7591

FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0003 - 50309

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: General Matters

Professional Services:

	Hours	Amount
06/24/09 KFW Research liability of maker of note if Deed in Lieu or Deed after Notice is accepted (.7); letter to client regarding opinion (.3)	1.00	250.00
07/10/09 KFW Conference with client regarding CMF Insurance Agency (.3) and Ropollo (.2)	0.50	125.00
07/20/09 KFW Mail and e-mail tax sale notices to client	0.20	50.00
08/17/09 KFW Telephone call from Mr. McGee regarding Cadillac Drive unit and status	0.30	75.00
TAM Conference with Attorney Winkler regarding status of files	0.30	63.00
Total professional services	2.30	\$563.00
Previous balance		\$163.00
07/29/09 Payment - thank you. Check No. 46095		(\$163.00)
Total payments		(\$163.00)
TOTAL AMOUNT DUE:		\$563.00

Group Exhibit "B"

Oliver, Close Worden, Winkler &
Greenwald's Final Application for Allowance
of Payment of Compensation

Commercial Mortgage & Finance Co.

Page 2

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Karl F. Winkler	2.00	250.00	\$500.00
Timothy A. Miller	0.30	210.00	\$63.00

Please note: Costs and expenses incurred but not included in this invoice will be submitted to you for payment at a later date.

PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

**OLIVER, CLOSE, WORDEN,
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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0044 - 50311

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: Aire Holding Mechanic Lien Foreclosure**Professional Services:**

	<u>Hours</u>	<u>Amount</u>
06/09/09 KFW Letter to Attorney Macholl with settlement check (.2); telephone conference with Mike D'Agostino regarding indebtedness and McGee (.2)	0.40	100.00
07/02/09 KFW Conference with clients regarding Chicago Title liability for defense costs and their file (or lack of it) on claim acknowledgment on 2/10/09	0.40	100.00
Total professional services	<u>0.80</u>	<u>\$200.00</u>
Previous balance		\$5,750.00
07/29/09 Payment - thank you. Check No. 46095		(\$5,750.00)
Total payments		<u>(\$5,750.00)</u>
TOTAL AMOUNT DUE:		<u>\$200.00</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Karl F. Winkler	0.80	250.00	\$200.00

Please note: Costs and expenses incurred but not included in this invoice will be submitted to you for payment at a later date.

PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

**OLIVER, CLOSE, WARDEN,
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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0031 - 50310

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: **Affiliated Financial Corporation****Professional Services:**

	<u>Hours</u>	<u>Amount</u>
07/14/09 DAD Dictate letter to Mike D'Agostino regarding Second Quarter Report from Smith	0.10	23.00
		<u>\$23.00</u>
Total professional services	0.10	\$23.00
TOTAL AMOUNT DUE:		<u><u>\$23.00</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Debra A. Delia	0.10	230.00	\$23.00

Please note: Costs and expenses incurred but not included in this invoice will be submitted to you for payment at a later date.

PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

**OLIVER, CLOSE, WORDEN,
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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0045 - 50312

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: **Kenneth Barnhart****Professional Services:**

	Hours	Amount
06/24/09 TAM Prepare for Court; attendance in Court, Judgment entered	0.90	189.00
Total professional services	0.90	\$189.00
Previous balance		\$984.00
07/29/09 Payment - thank you. Check No. 46095		(\$984.00)
Total payments		(\$984.00)
TOTAL AMOUNT DUE:		\$189.00

Timekeeper Summary

Name	Hours	Rate	Amount
Timothy A. Miller	0.90	210.00	\$189.00

**OLIVER, CLOSE, WARDEN,
WINKLER & GREENWALD LLC**

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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0049 - 50313

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

**In the matter of: Foreclosure Against Neftali Development
Venture**

Professional Services:

		<u>Hours</u>	<u>Amount</u>
06/04/09	KFW Prepare for hearing on Motions (.7); argument of Motions (1.0)	1.70	425.00
06/21/09	KFW Review and analyze loan files for vital documents, privilege documents, possible defenses by defendants	1.60	400.00
07/02/09	KFW Conference with client regarding documents indicating other parties to debt and possible releases of original guarantors	0.30	75.00
07/06/09	KFW Letter to Attorney Sewell regarding Barclay agreement with Reyes	0.20	50.00
08/05/09	KFW Dictate Response to Affirmative Defenses (.8); correspondence to attorneys and Clerk (.2)	1.00	250.00
08/11/09	KFW Dictate and e-mail Barclay Entry of Appearance and pleadings per Coate's attorney assertion that he will voluntarily appear	0.20	50.00
08/18/09	KFW Attorney Sewell calls regarding closing for Reyes (.2); examine closing documents and statement (.3); telephone conference with Mr. McGee regarding Commercial Mortgage & Finance share (.2); telephone conference with Attorney Sewell	1.30	325.00

Commercial Mortgage & Finance Co.

Page 2

	<u>Hours</u>	<u>Amount</u>
regarding conditions; prepare partial release (.2); form letter to title company (.4)		
Total professional services	6.30	\$1,575.00

TOTAL AMOUNT DUE:	\$1,575.00
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Trust Account Activity:

Previous Balance of Funds In Trust:	\$4,000.00
08/24/09 Trust Account Deposit from NLT Title, L.L.C. regarding Buyer: Christopher Cottrell and Seller: Lorenzo Reyes. Check No. 117326	\$2,437.04
New Balance of Funds Held In Trust:	\$6,437.04

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Karl F. Winkler	6.30	250.00	\$1,575.00

**OLIVER, CLOSE, WORDEN,
WINKLER & GREENWALD LLC**

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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0074 - 50314

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: Mid-Deb

Professional Services:

		<u>Hours</u>	<u>Amount</u>
06/08/09	KFW Telephone call from Attorney Sewell regarding sale and closing	0.20	50.00
06/09/09	KFW Review Contract to Sell (.4), title work (.3), closed file records of Lease and Easement (.3); draft Deed (.2); telephone call from Attorney Ward regarding Deed and closing (.2); proofread Deed (.2); fax copy to parties (.3); e-mail to Attorney Ward regarding Order (.2); convert to pdf and e-mail (.2)	2.30	575.00
06/10/09	KFW Communication with Attorney Ward and title company regarding closing statement and final documents: Deed, Ptax (.5); discuss closing with client (.2)	0.70	175.00
06/11/09	KFW Closing of sale	0.80	200.00
	Total professional services	4.00	\$1,000.00

TOTAL AMOUNT DUE:\$1,000.00

Commercial Mortgage & Finance Co.

Page 2

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Karl F. Winkler	4.00	250.00	\$1,000.00

Please note: Costs and expenses incurred but not included in this invoice will be submitted to you for payment at a later date.

PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

**OLIVER, CLOSE, WORDEN,
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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0093 - 50315

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

**In the matter of: U.S. Bank National Association v. Heling
and Commercial Mortgage & Finance Co.**

Professional Services:

	Hours	Amount
07/30/09 TAM Review of Local Court Rules of Sheboygan County; working on default document	0.40	84.00
Total professional services	0.40	\$84.00

TOTAL AMOUNT DUE:**\$84.00****Timekeeper Summary**

Name	Hours	Rate	Amount
Timothy A. Miller	0.40	210.00	\$84.00

Please note: Costs and expenses incurred but not included in this invoice will be submitted to you for payment at a later date.

PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

Document Page 18 of 33
**OLIVER, CLOSE, WORDEN,
 WINKLER & GREENWALD LLC**

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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0098 - 50325

September 14, 2009

Commercial Mortgage & Finance Co.
 115 Seventh Street
 Rockford, IL 61104-1275

In the matter of: CMF Insurance Matter

Professional Services:

		Hours	Amount
06/07/09	KFW Review and analyze bank statements	1.00	250.00
07/09/09	KFW Draft Complaint with attachments (2.0); letter to client regarding draft and action requested (.2); draft Notice to client (.2)	2.40	600.00
07/21/09	KFW Legal research on liability of agent of company for fraud	0.80	200.00
07/23/09	KFW Add counts for fraud and breach of fiduciary duty to draft Complaint	0.70	175.00
	AMF Draft requests to Secretary of State for expedited last Annual Report and any Amendments to Articles filed after 1/1/09; telephone conference with Secretary of State; receive and review fax	0.30	27.00
07/24/09	KFW Telephone conference with client regarding CMF Insurance special meeting, board of directors and officers	0.30	75.00
07/27/09	KFW Final draft of Three Count Complaint with insurance code provisions added as well as fraud and fiduciary duty; get client signature on Notice of Special Meeting; hand deliver letter	4.00	1,000.00

Commercial Mortgage & Finance Co.

Page 2

		<u>Hours</u>	<u>Amount</u>
	and Notice to both Attorney Hampilos and Bianchis, along with Complaint; e-mail drafts, letter, Notice to Mr. Koch, Mr. Jordan and client; conversation with Mr. Hampilos		
07/28/09	KFW Telephone conference with Mr. Koch regarding shareholder meeting Thursday	0.30	75.00
07/29/09	KFW Meet with client and prepare for shareholders meeting	0.70	175.00
	KFW Notice of shareholders meeting, minutes of meeting after review CMF Insurance by-laws	0.70	175.00
07/30/09	KFW Telephone conference with Mr. Koch (.2); Forbearance Agreement (.4)	0.60	150.00
	KFW Meet with client, Creditors Committee, Bianchis and Attorneys Hampilos and Koch	2.00	500.00
	KFW Confidentiality Agreement for prospective purchasers	0.30	75.00
08/17/09	KFW E-mail to Attorney Hampilos regarding prospective purchaser due diligence and conference with Mr. McGee and Ms. Moore	0.30	75.00
	Total professional services	<u>14.40</u>	<u>\$3,552.00</u>

TOTAL AMOUNT DUE:

\$3,552.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alice M. Field	0.30	90.00	\$27.00
Karl F. Winkler	14.10	250.00	\$3,525.00

**OLIVER, CLOSE, WORDEN,
WINKLER & GREENWALD LLC**

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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0099 - 50317

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: Bankruptcy Matters

Professional Services:

	Hours	Amount
06/04/09 KFW Draft application for fees and expenses (.4); review case status and make table with notes (.5)	0.90	225.00
06/05/09 KFW Telephone call from Mike D'Agostino with questions	0.20	50.00
06/08/09 KFW Review proposed Plan of Confirmation	0.70	175.00
07/06/09 KFW Update matters status	0.40	100.00
07/15/09 KFW Prepare for hearing on fees (.3) and conference with Creditors Committee on CMF Insurance Agency (1.00); hearing (.6); conference with Creditors Committee and debtor and their attorneys (1.2)	3.10	775.00
Total professional services	5.30	\$1,325.00

TOTAL AMOUNT DUE:**\$1,325.00****Timekeeper Summary**

Name	Hours	Rate	Amount
Karl F. Winkler	5.30	250.00	\$1,325.00

OLIVER, CLOSE, WARDEN,
WINKLER & GREENWALD LLC

Attorneys at Law
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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0101 - 50318

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

**In the matter of: Foreclosure of Property Against
Winchester Builders, LLC**

Professional Services:

	Hours	Amount
07/09/09 KFW Get title work and other liens shown (.2); conference with Mike D'Agostino (.5)	0.70	175.00
07/21/09 KFW Motion for Summary Judgment of Foreclosure with attachments	0.60	150.00
07/30/09 KFW Motion for Summary Judgment (.2), Affidavit of client (.2), Affidavit of attorney's fees and costs (.2), Notice of Motion (.2), proposed Judgment Order of Foreclosure and Default of Guarantors (.3)	1.10	275.00
08/04/09 KFW Appear in Court for Judgment of Foreclosure and Default on Guarantors (42 on call)	1.80	450.00
Total professional services	4.20	\$1,050.00

TOTAL AMOUNT DUE:**\$1,050.00**

Commercial Mortgage & Finance Co.

Page 2

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Karl F. Winkler	4.20	250.00	\$1,050.00

Please note: Costs and expenses incurred but not included in this invoice will be submitted to you for payment at a later date.

PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

OLIVER, CLOSE, WORDEN,
WINKLER & GREENWALD LLC

Attorneys at Law

Post Office Box 4749
Suite 300, Waterside Center
124 North Water Street
Rockford, IL 61110-4749
Telephone: (815) 968-7591

FEDERAL IDENTIFICATION #36-3834539

Invoice # 62C01.0102 - 50326

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: Foreclosure of Property Against A&D
Properties, LLC

Professional Services:

	<u>Hours</u>	<u>Amount</u>
08/17/09 KFW Review updated title work (.2); analyze status of each of five lien claimants (.7); draft Amended Complaint (.4); do Motion and Notice (.2); conference with Mr. McGee	<u>1.50</u>	<u>375.00</u>
Total professional services	<u>1.50</u>	<u>\$375.00</u>
Previous balance		\$325.00
7/29/2009 Payment - thank you. Check No. 46095		(\$325.00)
Total payments		<u>(\$325.00)</u>
TOTAL AMOUNT DUE:		<u><u>\$375.00</u></u>

Commercial Mortgage & Finance Co.

Page 2

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Karl F. Winkler	1.50	250.00	\$375.00

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PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

Document Page 26 of 33
**OLIVER, CLOSE, WORDEN,
 WINKLER & GREENWALD LLC**

Attorneys at Law

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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0103 - 50327

September 14, 2009

Commercial Mortgage & Finance Co.
 115 Seventh Street
 Rockford, IL 61104-1275

**In the matter of: Commercial Mortgage & Finance Co. v.
 Randall L. Clark and Dawn M.
 Clark/Foreclosure of Real Estate**

Professional Services:

	Hours	Amount
07/08/09 KFW Appear for Default Judgment; defendant appears; Judgment Order entered (Commercial Mortgage & Finance vs. Clark)	0.50	125.00
 Total professional services	0.50	\$125.00
 Previous balance		\$617.70
 7/29/2009 Payment - thank you. Check No. 46096		(\$3.70)
7/29/2009 Payment - thank you. Check No. 46095		(\$614.00)
 Total payments		(\$617.70)
 TOTAL AMOUNT DUE:		\$125.00

Timekeeper Summary

Name	Hours	Rate	Amount
Karl F. Winkler	0.50	250.00	\$125.00

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PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

**OLIVER, CLOSE, WORDEN,
WINKLER & GREENWALD LLC**

Attorneys at Law
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Suite 300, Waterside Center
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Rockford, IL 61110-4749
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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0105 - 50321

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: Countrywide Home Loans v. Randall Clark,
Commercial Mortgage & Finance Co., et al.
Winnebago County Case No. 2009 CH 642

Professional Services:

	<u>Hours</u>	<u>Amount</u>
08/03/09 KFW Status letter to client regarding Countrywide foreclosure	0.20	50.00
Total professional services	0.20	\$50.00

TOTAL AMOUNT DUE:**\$50.00****Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Karl F. Winkler	0.20	250.00	\$50.00

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PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

**OLIVER, CLOSE, WARDEN,
WINKLER & GREENWALD LLC**

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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0106 - 50322

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: Thorhen Capital Partners, LLC

Professional Services:

	Hours	Amount
06/19/09 KFW Consult with client regarding Thorhen Capital Partners and proposed collateral assignment of rents and option to purchase	0.50	125.00
Total professional services	0.50	\$125.00

TOTAL AMOUNT DUE:**\$125.00****Timekeeper Summary**

Name	Hours	Rate	Amount
Karl F. Winkler	0.50	250.00	\$125.00

Please note: Costs and expenses incurred but not included in this invoice will be submitted to you for payment at a later date.

PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

**OLIVER, CLOSE, WORDEN,
WINKLER & GREENWALD LLC**

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FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0107 - 50323

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: Oscar and Cynthia Guerra Lease Agreement

Professional Services:

	<u>Hours</u>	<u>Amount</u>
06/19/09 KFW Consult with client on Guerra Lease of 501 Prairie Knoll and collection of remainder of rentals	0.50	125.00
Total professional services	0.50	\$125.00
TOTAL AMOUNT DUE:		\$125.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Karl F. Winkler	0.50	250.00	\$125.00

OLIVER, CLOSE, WORDEN,
WINKLER & GREENWALD LLC

Attorneys at Law
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Rockford, IL 61110-4749
Telephone: (815) 968-7591

FEDERAL IDENTIFICATION #36-3834559

Invoice # 62C01.0108 - 50324

September 14, 2009

Commercial Mortgage & Finance Co.
115 Seventh Street
Rockford, IL 61104-1275

In the matter of: Steven Moore

Professional Services:

		<u>Hours</u>	<u>Amount</u>
02/25/09	TAM Telephone conference with Karla Chester regarding Leases/forcible issues	0.60	126.00
02/27/09	TAM Telephone conference with Karla regarding documents; conference with Attorney Winkler	0.50	105.00
03/16/09	TAM Telephone conference with Karla Chester; draft 5-Day Notice; electronic communication to client	0.80	168.00
03/17/09	TAM Draft Complaint; letter to client	0.90	189.00
04/10/09	TAM Prepare for Court; drafting Affidavits regarding military service, Attorney Fee Affidavit; attendance in Court; conference with defendant; Judgment of Possession and for Rent entered; telephone conferences with client regarding status and results	2.20	462.00
05/18/09	TAM Draft Wage Deduction Summons and Affidavit for Diane Moore/The Experience; draft Wage Deduction Affidavit for Steve Moore/Cliffbreakers	1.20	252.00
06/30/09	TAM Drafting Wage Deduction Orders - Conditional Judgments	0.20	42.00

Commercial Mortgage & Finance Co.

Page 2

		<u>Hours</u>	<u>Amount</u>
06/30/09	TAM Review of file for Employer Answers to Wage Garnishments; drafting Order for Conditional Judgments	0.60	126.00
07/30/09	TAM Letter to employer regarding Wage Deduction Order	0.20	42.00
	TAM Letter to client regarding payment	0.20	42.00
08/04/09	TAM Drafting Summons for Conditional Judgment	0.30	63.00
08/18/09	TAM Review of correspondence; letter to client regarding payment and Conditional Judgment	0.30	63.00
	Total professional services	8.00	\$1,680.00

TOTAL AMOUNT DUE:

\$1,680.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Timothy A. Miller	8.00	210.00	\$1,680.00

Please note: Costs and expenses incurred but not included in this invoice will be submitted to you for payment at a later date.

PAYMENT DUE UPON RECEIPT OF THIS INVOICE. PAST DUE IN 30 DAYS.

09/15/09
9:03 AM

Oliver, Close, Worden, Winkler & Greenwald LLC
Funds Transaction Listing

Page 1

Selection Criteria

Clie.Selection Include: 62C01.0104
Fund.Transaction Dat 06/01/09 - 09/14/09
Fund.Classification Open

'B' for Billed. 'P' for Posted.

ID	Type	Client	Total
Date/Chk #	Invoice #	Account Name	
5640	DEP	CMF/T/AExpenseA	3582.50
07/31/09		Client Funds Held in Trust	
46100		Trust Account Deposit from Commercial Mortgage & Finance. Check No. 46100	
5641	DEP	CMF/T/AExpenseA	1417.50
07/31/09		Client Funds Held in Trust	
22969		Trust Account Deposit from CMF Mortgage. Check No. 22969	
5648	WITH	CMF/T/AExpenseA	(349.96)
08/06/09		Client Funds Held in Trust	
		Trust Account Withdrawal - Ck. #7930 to Oliver, Close, Worden, Winkler & Greenwald for reimbursement of photocopy charges for filing Second Application for Compensation on 6/11/09 (\$198.44), postage for filing Second Application for Compensation on 6/11/09 (\$41.80) and Public Access to Court Electronic Records on 5/1/09, 5/28/09, 6/5/09, 6/8/09, 6/9/09 and 6/30/09 (\$14.72) regarding CMF/Bankruptcy Matter (62C01.0099) and Winnebago County Circuit Clerk fee for issuance of Alias Summons to Confirm Judgment by Confession for defendant, Patrick G. Barclay, regarding CMF v. Reyes et al. in Case Nos. 2009 L 82 and 2009 L 83 (\$10.00) and Salus Services, Inc. fee for service of Alias Summons, Verified Complaint and Confession of Judgment and Order of Judgment on Patrick G. Barclay regarding CMF v. Reyes, et al. in Case Nos. 2009 L 82 and 2009 L 83 (\$85.00) for CMF v. Neftali (62C01.0049)	
5659	WITH	CMF/T/AExpenseA	(170.50)
08/21/09		Client Funds Held in Trust	
		Trust Account Withdrawal - Ck. #7935 to Oliver, Close, Worden, Winkler & Greenwald for reimbursement of postage for mailing Judgment Notice on 8/5/09 regarding CMF/U.S. Bank v. Heling (62C01.0093) for \$8.37, Illinois Secretary of State fee for expedited copy of last Annual Report on 7/23/09 regarding CMF/CMF Insurance Matter (62C01.0098) for \$77.00, Public Access to Court Electronic Records on 7/3/09, 7/7/09 and 7/29/09 regarding CMF/Bankruptcy Matters (62C01.0099) for \$3.28, mileage for roundtrip to Belvidere, IL for court appearance for Judgment of Foreclosure on 8/19/09 regarding CMF/Winchester (62C01.0101) for \$14.85, Professional Investigations & Services for service of wage deduction against Diana Moore on 6/5/09 regarding CMF/Steven Moore (62C01.0108) for \$33.50 and Professional Investigations & Services for service of wage deduction against Steven Moore on 6/30/09 regarding CMF/Steven Moore (62C01.0108) for \$33.50	
5669	WITH	CMF/T/AExpenseA	(128.00)
09/01/09		Client Funds Held in Trust	
		Trust Account Withdrawal - Ck. #7944 to Boone County Circuit Clerk for entry of appearance on behalf of Carl Roppolo for A&D Properties regarding CMF vs. A&D Properties (62C01.0102)	
5673	WITH	CMF/T/AExpenseA	(196.15)
09/10/09		Client Funds Held in Trust	
		Trust Account Withdrawal - Ck. #7948 to Professional Investigations & Services for service of Summons and Amended Complaint on defendants: Electrical Systems of Rockford, Inc., Bestler Corporation, Gene Nelson & Sons and Hermanson Painting & Decorating, Inc. regarding CMF vs. A&D Properties, et al. (62C01.0102)	

Exhibit "C"

Oliver, Close Worden, Winkler &
Greenwald's Final Application for Allowance
of Payment of Compensation

09/15/09
9:03 AM

Oliver, Close, Worden, Winkler & Greenwald LLC
Funds Transaction Listing

Page 2

ID	Type	Client	Total
Date/Chk #	Invoice #	Account Name	
5674	WITH	CMF/T/AExpenseA	(303.64)
09/14/09		Client Funds Held in Trust	
		Trust Account Withdrawal - Ck. #7949 to Oliver, Close, Worden, Winkler & Greenwald for reimbursement of costs advanced - paid Winnebago County Circuit Clerk fee for filing Complaint in Forcible Entry and Detainer on 3/24/09 (\$144.00), GW Porter and Associates fee for service of Summons and Complaint on 3/31/09 (\$35.00), Winnebago County Circuit Clerk fee for issuance of wage deduction against Steven and Diana Moore on 5/15/09 (\$60.00) and Cook County Sheriff fee for service of wage deduction on Cliffbreakers for Steven Moore on 5/21/09 (\$60.00) all regarding CMF vs. Steven Moore (62C01.0108) and expense of Public Access to Court Electronic Records fee on 8/5/09, 8/11/09 and 8/18/09 (\$4.64) regarding CMF/Bankruptcy (62C01.0099)	
5675	WITH	CMF/T/AExpenseA	(33.50)
09/14/09		Client Funds Held in Trust	
		Trust Account Withdrawal - Ck. #7950 to Oliver, Close, Worden, Winkler & Greenwald for reimbursement of cost advanced to Professional Investigations & Services for service of Conditional Judgment regarding CMF vs. Moore (62C01.0108)	
Grand Total			
Deposit			5000.00
Withdrawal			(1181.75)